RE: FCC Launches Ninth Inquiry Into Broadband Availability

Dear FCC Commision:

I am writing you today to submit public comment and feedback on the FCC's "Ninth Inquiry Into Broadband Availability". I am a Free Open Source Software Developer and also participate in workgroups that develop draft plans that have effect on how internet technology advances worldwide.

The following is my feedback on the inquiry the FCC has launched:

Definition of Advanced Telecommunications Capability

Current Definition:

Section 706 defines advanced telecommunications capability as "high-speed, switched, broadband telecommunications capability that enables users to originate and receive high-quality voice, data, graphics, and video telecommunications using any technology.

Feedback:

I think that Section 706 clearly defines what most households would consider a "Advanced Telecommunications Capability" and further believe the definition is consistent with what experts would define such as. I do not feel there is a need for this term to be re-defined but I think what we consider "high-speed" or "broadband" is rapidly evolving since technological advancements continue to make speed capabilities significantly greater while also lowering the cost of "high-speed" or "broadband" internet service providers"

Speed Threshold

Feedback:

I think the threshold or benchmark set in 2010 (4Mbps/1Mbps) is irrelevant at this point in time in 2010 those speeds might have been considered high-speed but in reality in 2012 4Mbps/1Mbps are not able to meet the demands of a normal consumer household or even a small business.

I think in reality the FCC should change the benchmark to be something in the area of 10Mbps/4Mbps for a service to be considered true "high-speed" or "broadband".

Latency Threshold

Feedback:

I feel latency is an important aspect for any agency considering or defining broadband and in my opinion services such as satelitte internet that are notorious for high latency would not meet my personal definition of "broadband" because the high latency degrades the capability of accessing voice, video and data in the manner in which content providers hope for consumers to receive them.

Data Capacity Threshold

Feedback:

I think it is of the upmost importance for the FCC to immediately address the limitations that ISP's are placing on consumers in regards to the amount of data they can send or receive in a service or billing cycle. The limitations that ISP's are implementing are not a result in growing costs on their end as a provider if anything ISP's significantly lower their costs over time since they own the infrastructure and it costs less than a penny for them to offer a Gigabyte of data.

My biggest concern is that ISP's are adding data caps as a attempt to increase their profits not due to limitations or rising costs. By implementing Data Capacity's they also reduce the Advanced Telecommunications Capability they extend to consumers.

Mobile Services

Feedback:

I do believe Mobile Services should be considered seperately since their infrastructure is much different than fixed service and has true limitations where fixed service has very little limitations except for those that ISP's create in order to generate higher profits.

Is broadband being deployed to all Americans?

Feedback:

Absolutely not. I think considering the funding that ISP's get from Congress to increase Broadband offerins nationwide that there has been an absolute disappointment when it comes to deploying broadband in rural areas and improving infrastructure. Many other countries do not offer funding, grants or subsidies to their ISP's yet they continue to have stronger, faster infrastructure at a lower cost.

Sincerely,

Benjamin Kerensa